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May 22, 2013

Brian Jones
Senior Campaign Finance Analyst
Report Analysis Division
Federal Election Commission
999 E Street Washington, DC 20463

Re: Citizens United Political Victory Fund, FEC ID No. C00295527
Response to your letter dated April 17, 2013 regarding the amended October monthly report covering September 1, 2012 ?
September 30, 2012.

Dear Mr. Jones:

Pursuant to your request for clarification regarding the two items identified in the above-referenced correspondence, please be advised as follows:

1. The additional disbursement at issue was a payment to InfoCision Management Corporation in the amount of \$91,473.79 made on September 26, 2012. As indicated in the amended report, this disbursement was for a membership communication.

This transaction, which did not clear the committee's bank account until October 2012, was not properly recorded by the committee's bookkeeper at the time that it occurred; hence, it was missed during the reconciliation of the committee's September 2012 bank statement. Once discovered, an amended report was filed disclose the transaction.

2. The September 27, 2011 contribution to Ted Cruz for Senate that you reference in the attachment to your letter was erroneously reported as a contribution for the 2012 general election. However, the contribution was actually made for the GOP run-off election that occurred in July 2012. An amended report covering September 2011 is being filed to correct the erroneous disclosure.

Please feel free to contact me if you should have any further questions regarding this matter. Thank you.

Sincerely,

Michael Boos
Citizens United Vice President
& General Counsel
